

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
KOONTZ-WAGNER CUSTOM	§	Case No. 18-33815
CONTROLS HOLDINGS LLC	§	Chapter 7
	§	JUDGE ISGUR
Debtor.	§	

**TRUSTEE’S EMERGENCY MOTION FOR ORDER AUTHORIZING
(I) THE ASSUMPTION OF THE ASSET MARKETING AGREEMENT
WITH HILCO INDUSTRIAL, LLC; (II) AUTHORIZING THE SALE OF
PROPERTY PURSUANT TO AUCTION; AND (III) PAYING COMMISSION
TO HILCO AS AN ADMINISTRATIVE EXPENSE OF THE ESTATE**

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING, SPECIFICALLY ANSWERING EACH PARAGRAPH OF THIS PLEADING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY-ONE (21) DAYS FROM THE DATE YOU WERE SERVED WITH THIS PLEADING. YOU MUST SERVE A COPY OF YOUR RESPONSE ON THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE:

Rodney D. Tow, chapter 7 trustee (the “Trustee”) of the estate of Koontz-Wagner Custom Controls Holding LLC (the “Debtor”) files this motion (the “Motion”) for entry of an order authorizing the Trustee to (i) assume the Asset Marketing Agreement between the Debtor

and Hilco Industrial, LLC (“Hilco”) dated May 22, 2018, attached hereto as Exhibit A, as amended pursuant to agreement with Hilco and reflected in the Proposed Order, (ii) sell property of the estate located at 6207 Jim Snow Way, Chattanooga, TN 37421 pursuant to an online auction administered by Hilco pursuant to the Asset Marketing Agreement, and (iii) and pay Hilco’s commission pursuant to the Asset Marketing Agreement, and in support thereof would show this Court as follows:

JURISDICTION

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This Motion is a core proceeding pursuant to 28 U.S.C. § 157(b).

2. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested in this Motion are §§ 105(a), 363, 365(a), and 503(a) of title 11 of the United States Code (“Bankruptcy Code”).

BACKGROUND

A. Case Background

4. On July 11, 2018 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 7 of the Bankruptcy Code. The Trustee was appointed on July 11, 2017.

5. The Debtor has not yet filed its schedules of assets and liabilities and a meeting of creditors pursuant to Bankruptcy Code § 341 has not yet been scheduled by the office of the United States Trustee.

B. The Asset Marketing Agreement

6. Prior to the Petition Date, the Debtor entered into an agreement titled “Asset Marketing Agreement” dated May 22, 2018, with Hilco. Under the Asset Marketing Agreement, the Debtor agreed to retain Hilco to be its exclusive marketing and sales agent for the Debtor’s assets (the “Assets”) located at the Debtor’s facility at 62017 Jim Snow Way, Chattanooga, TN

37421 (the “Chattanooga Facility”).¹ Among other things, under the Asset Marketing Agreement, Hilco agreed to:

- Develop an advertising and marketing plan for the sale of the Assets;
- Implement the advertising and marketing plan as deemed necessary or appropriate by Hilco to maximize the net recovery on the Assets;
- Prepare for the sale of the Assets, including gathering specifications and photographs for pictorial brochures and arranging the Assets in a manner, which in Hilco’s judgment would be designed to enhance the net recovery on the Assets;
- Provide fully qualified and experienced personnel who will prepare for and sell the Assets under the Asset Marketing Agreement;
- If applicable, provide a complete auction crew to handle computerized accounting functions necessary to provide auction buyers with invoices and the Company with a complete accounting of all Assets sold at the auction;
- Sell the Assets for cash or other immediately available funds to the highest bidder(s) on an “AS IS,” “WHERE IS” and “all sales are final” basis;
- Charge and collect on behalf of Company from all purchasers any purchase price together with all applicable taxes in connection therewith; and
- Submit an initial sales report to the Debtor within fourteen (14) days after the sale of the Assets and a final complete sales report to the Company within fourteen days after the end of the Term.

In exchange, the Asset Marketing Agreement provides that Hilco will receive 5% of the gross receipts as a commission in addition to an 18% buyer’s premium.

C. Ongoing Auction of Assets at the Chattanooga Facility

7. Pursuant to the Asset Marketing Agreement, Hilco commenced an auction on its website to liquidate the Assets prior to the petition date. The auction website can be found at <https://auction.hilcoind.com/hilco/auctionDetails/240>. Hilco marketed the Assets and has already obtained bids on several of the Assets. The auction was originally set to close on July

¹ The Debtor’s assets at its other facilities—in South Bend, Indiana, Caldwell, Idaho, and Houston, Texas—are not subject to the Asset Marketing Agreement.

17, 2018, but this Hilco has extended the closing of the auction to July 24, 2018, to allow the Trustee to obtain the Court's permission to assume the executory contract and conduct the sale under the auction.

8. The Trustee is also negotiating with Hilco and the landlord, TJ Snow Company, to grant access to the purchasers from the auction to receive their purchases. Hilco is requesting \$10,000.00 for this service and the landlord is requesting to retain a very large paint booth that is located at the facility. The Trustee should have this resolved prior to any hearing on this Motion.

D. Trustee's Decision to Assume Asset Marketing Agreement and Sell Assets at the Chattanooga Facility

9. The Trustee believes that assuming the Asset Marketing Agreement will maximize the Debtor's estate and creditors' recovery. Hilco is a reputable liquidator of equipment and the terms of the Asset Marketing Agreement are standard for the industry. Any ultimate liquidating of these assets will require the Trustee to enter into an agreement substantially similar to a company similar to Hilco.

10. The Trustee seeks to take advantage of the efforts of the Debtor and Hilco have put in the marketing of the Assets through the assumption of the Asset Marketing Agreement. These efforts have resulted in pending bids on the Assets that are scheduled to close on July 24, 2018, which would bring money into the estate to fund administration of the case.

11. The Trustee also believes that the marketing and auction efforts of Hilco are calculated to maximize the value that the estate will receive in exchange for the Assets. The bids obtained through Hilco's online auction process are likely to reflect the highest and best offer for the Assets.

RELIEF REQUESTED

12. Pursuant to Bankruptcy §§ 105(a), 363, 365(a), and 503(a), the Trustee respectfully requests that the Court enter an order substantially in the form of the Proposed Order authorizing the Trustee to assume the Asset Marketing Agreement, sell the Assets pursuant to Hilco's online auction, and pay commission to Hilco as an administrative expense of the estate.

BASIS FOR RELIEF

13. A trustee may sell, after notice and a hearing, a debtor's assets outside the ordinary course of business. 11 U.S.C. § 363(b)(1). Generally, to obtain approval of a proposed sale of assets, a trustee must "satisfy its fiduciary duty to the debtor, creditors and equity holders, [by articulating some] business justification for using, selling, or leasing the property outside the ordinary course of business." *In re Continental Air Lines, Inc.*, 780 F.2d 1223, 1226 (5th Cir. 1986).

14. Assumption or rejection of an executory contract is also a matter left to the business judgment of trustees. "As long as assumption of a lease appears to enhance a debtor's estate, court approval of a debtor-in-possession's decision to assume the lease should only be withheld if the debtor's judgment is clearly erroneous, too speculative, or contrary to the provisions of the Bankruptcy Code. . . ." *Richmond Leasing Co. v. Capital Bank, N.A.*, 762 F.2d 1303, 1309 (5th Cir. 1985) (quoting *Allied Technology, Inc. v. R.B. Brunemann & Sons*, 25 B.R. 484, 495 (Bankr. S.D. Ohio 1982)).

15. Assuming the Asset Marketing Agreement and selling the Assets pursuant to Hilco's online auction is the most efficient way to maximize value of the bankruptcy estate. The auction process is reasonable in light of the industry standard for liquidating equipment of the same type of the Assets and likely to bring in the highest and best offers for the Assets significantly sooner than any alternative.

16. Thus, in the Trustee's business judgment, assuming the Asset Marketing Agreement and selling the Assets pursuant to the Hilco's online auction will result in the best recovery for the estate and its creditors.

17. Additionally, Bankruptcy Code § 503(a) provides that "there shall be allowed administrative expenses, other than claims allowed under section 502(f) of this title, including . . . the actual, necessary costs and expenses of preserving the estate including . . . wages, salaries, and commissions for services rendered after the commencement of the case." The Trustee believes that Hilco would be entitled to its commissions under the Asset Marketing Agreement upon its assumption and the sale of the Assets pursuant to the auction. Rather than requiring Hilco to file a separate request for payment of administrative expense, the Trustee proposes, pursuant to Bankruptcy Code § 105(a).

REQUEST FOR EMERGENCY CONSIDERATION

18. Hilco's auction was originally scheduled to end on July 17, 2018, but was extended to July 24, 2018. The Trustee believes that a second postponement of the closing of the auction would chill bids. Emergency consideration of the relief requested herein is necessary to allow the auction to continue.

CONCLUSION

WHEREFORE, the Trustee respectfully requests that the Court enter an order, substantially in the form of the Proposed Order, authorizing the authorizing the Trustee to assume the Asset Marketing Agreement, sell the Assets pursuant to Hilco's online auction, and pay commission to Hilco as an administrative expense of the estate.

Dated: July 18, 2018.

Respectfully submitted,

Cooper & Scully, PC.

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*Proposed Counsel to Rodney D. Tow as the Chapter
7 Trustee*

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2018, a true and correct copy of this Motion was served on all parties on the attached service list, including parties requesting notice, via either ECF Notification or by first class mail, postage prepaid.

/s/ Julie M. Koenig
Julie M. Koenig

Label Matrix for local noticing
0541-4
Case 18-33815
Southern District of Texas
Houston
Mon Jul 16 11:05:17 CDT 2018

Koontz-Wagner Custom Controls Holdings LLC
6510 Bourgeois Rd.
Houston, TX 77066-3110

United States Bankruptcy Court
PO Box 61010
Houston, TX 77208-1010

A Company Inc
P.O. Box 410004
Salt Lake City, UT 84141-0004

ABF Freight Systems, Inc.
813 W. Sample St.
South Bend, IN 46601-2845

AG Equipt. Inc
414 N Kit Ave.
Caldwell, ID 83605-6723

ALTA Equipment Company, Inc.
25538 Network Place
Chicago, IL 60673-1255

ASCO Power Technologies, LP
P.O. Box 73473
Chicago, IL 60673-7473

ATEX Distributing, Inc
2900 W. Orange Ave., #130
Apopka, FL 32703-3327

ATLAS BOLT & SUPPLY, INC.
3217 Rossville Blvd.
Chattanooga, TN 37407-1923

ATS Specialized, Inc.
P.O. Box 1450
Minneapolis, MN 55485-7130

Action Glass Co, Inc.
54978 Mayflower Rd.
South Bend, IN 46628-5058

Adams Remco Inc.
2612 Foundation Dr.
South Bend, IN 46628-4390

Advanced Water Solutions
P.O. Box 1200
South Bend, IN 46624-1200

Advantage Interests, Inc.
7840 W. Little York
Houston, TX 77040-5310

Aeroacoustic Engineering Consultants, LL
8014 Olson Hwy., #210
Minneapolis, MN 55427-4712

Agility Project Logistics, Inc.
P.O. Box 844718
Dallas, TX 75284-4718

Air Filters, Inc.
8282 Warren Rd.
Houston, TX 77040-2602

Airgas Intermountain, Inc
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Pasadena, CA 91109-7430

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110 WEST 7TH STREET
SUITE 1300
TULSA OK 74119-1106

Airgas USA, LLC
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Chicago, IL 60680-2576

Airgas USA, LLC (South)
P.O. Box 532609
Atlanta, GA 30353-2609

All Phase Electric Supply Co.
1385 Bendix Dr.
South Bend, IN 46628-2855

Allegheny Steel Distributors, Inc.
P.O. Box 645363
Pittsburgh, PA 15264-5251

Allegiance Crane & Equipment, LLC
P.O. Box 534687
Atlanta, GA 30353-4687

Allegis Corporation
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Minneapolis, MN 55485-1354

Allied Electronics
Attn: A/R Dept.
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Fort Worth, TX 76113-2325

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Fort Worth, TX 76113-2325

Alpha Process Sales, Inc.
12850 E. Bournewood Dr.
Sugar Land, TX 77478-2569

Alpha Threaded Products Inc.
6426 Long Dr.
Houston, TX 77087-3408

Alro Steel
1775 Foundation Dr.
Niles, MI 49120-8987

Always Safety & 1st Aid, Inc.
P.O. Box 1407
Alvin, TX 77512-1407

Americas
P.O. Box 7155
Pasadena, CA 91109-7155

American Fire Technologies, LLC
2120 Capital Dr.
Wilmington, NC 28405-6461

American Safety & First Aid
P.O. Box 59
Osceola, IN 46561-0059

Ametek-Soildstate Controls
875 Dearborn Dr.
Columbus, OH 43085-1596

Anheuser Marketing, Inc.
6941 Peachtree Industrial Blvd.
Norcross, GA 30092-3601

Anixter Bros. Inc.
P.O. Box 847428
Dallas, TX 75284-7428

Anixter, Inc.
P.O. Box 842591
Dallas, TX 75284-2591

Apollo Printing & Graphics
731 S. Michigan St.
South Bend, IN 46601-3101

Atlas Supply, Inc
611 S. Charlestown St.
Seattle, WA 98108-5239

Austin Hardware & Supply, Inc
Dept. CH 19373
Palatine, IL 60055-0001

Barton Mines, LLC
Barton Mines Company, LLC
P.O. Box 62516
Baltimore, MD 21264-2516

Bennett Machine & Welding Works
512 Main St.
Caldwell, ID 83605-3740

Best One Tire & Service of South Bend
2014 E. McKinley Ave.
Mishawaka, IN 46545-7204

Betenbender Mfg, Inc.
P.O. Box 140
Coggon, IA 52218-0140

Bisco Industries Inc
4424 S. 700 S., #120
Salt Lake City, UT 84107

Boise Calibration Service, Inc
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Boise, ID 83709-2835

Boise Rigging Supply, Inc.
P.O. Box 16627
Boise, ID 83715-6627

Boling Vision Center, LLC
2746 Old US 20 W, Suite B
Elkhart, IN 46514-1365

Bonita Cleaning Service
21543 Sullivan Forest Dr.
Porter, TX 77365-5957

Bonneville Industrial Supply Co
P.O. Box 51328
Idaho Falls, ID 83405-1328

Branom Instrument Co
P.O. Box 80307
Seattle, WA 98108-0307

Brown Strauss Steel Inc.
P.O. Box 16450
Salt Lake City, UT 84116-0450

Brucker Company, Inc.
1200 Greenleaf Ave.
Elk Grove Village, IL 60007-5519

C&R Sales and Repairing, Inc.
P.O. Box 1859
Red Oak, TX 75154-1567

CA Dept of Tax & Fee Administration
P.O. Box 942879
Sacramento, CA 94279-0001

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CSI Heavy Haul
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Wallisville, TX 77597-3032

CWB Group-Industry Services
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California Dynamics Corp
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Los Angeles, CA 90032-3195

California Franchise Tax Board
P.O. Box 942857
Sacramento, CA 94257-0500

Canyon Logistics
P.O. Box 55
Humble, TX 77347-0055

Capitol Environmental
P.O. Box 150056
Austin, TX 78715-0056

Cardinal Pump
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Saint Louis, MO 63146-4004

Catepillar Financial Services Corp.
2120 West End Ave.
Nashville, TN 37203-5341

Caterpillar Financial Services Corporati
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Dallas, TX 75373-0669

Center Lane Partners
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New York, NY 10165-1299

Centerpoint Energy Services, Inc.
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Dallas, TX 75303-1149

Certif-A-Gift Co.
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Chicago, IL 60666-0210

Chassis King
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Clearwater, FL 33756-1082

Chattanooga Gas
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Carol Stream, IL 60197-5408

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Houston, TX 77036-4937

Clean Seal, Inc.
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South Bend, IN 46680-2919

Cleaveland/Price Inc.
14000 Rt. 993
Trafford, PA 15085-9550

Clemtex II
248 McCarty
Houston, TX 77029-1138

Clover Associates, Inc.
d/b/a Clover Machinery Movers
1906 Clover Road
Mishawaka, IN 46545-7245

CoFlex, Inc.
851 Rt. 6
Shohola, PA 18458-3509

Coffee Time
55645 Currant Rd., #4
Mishawaka, IN 46545-4801

Columbia Electric Supply
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Vancouver, WA 98666-1120

Commercial Air Solutions
P.O. Box 23564
Chattanooga, TN 37422-3564

Commercial Door & Hardware
22578 FM 365
Beaumont, TX 77705-8835

Concur - ACH
62157 Collections Center Dr.
Chicago, IL 60693-0001

Container Management Inc
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Fishers, IN 46038-0380

Coosa Steel Corporation
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Rome, GA 30162-0187

Crawford Electric Supply Co., Inc.
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Cummins Rocky Mtn
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D&B Supply
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Caldwell, ID 83605-6077

DEQ State Office
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Boise, ID 83706-1253

DHL Express (USA) Inc.
16592 Collections Center Dr.
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2259 Haw Creek Cir.
Emmett, ID 83617-8999

Dave & Tom of Idaho, LLC
P.O. Box 97
Caldwell, ID 83606-0097

Dave & Tom, LLC
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DeFelsko Corporation
800 Proctor Ave.
Ogdensburg, NY 13669-2205

Deka Battery
1920 N. Kenmore St.
South Bend, IN 46628-1637

Delta Management Company, LLC
52733 Willowbend Dr.
Granger, IN 46530-7472

Deluxe Sheet Metal Inc.
6561 Lonewolf Dr., #100
South Bend, IN 46628-8466

Denton Enterprises
5615 Meadow Ct.
Nampa, ID 83687-8639

Department of Labor
402 W. Washington St., RM. W195
Indianapolis, IN 46204-2751

Department of Labor
900 Georgia Ave., #15
Chattanooga, TN 37402-2246

Dex West
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Phoenix, AZ 85062-9167

Dominion Building Products
P.O. Box 642184
Pittsburgh, PA 15264-2184

Dynalectric Company
5711 SW Hood Ave.
Portland, OR 97239-3715

EIS, Inc.
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ENI Labs
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EPB Electric Power
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Eaton Corporation
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Echo Global Logistics
22168 Network Pl.
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Eichstedt Manufacturing, Inc.
23030 W. Ireland Rd.
South Bend, IN 46614-4414

Electrical Wholesale Supply, Inc
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Idaho Falls, ID 83405-1980

Engineered Air C/O Commerce Bank
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Kansas City, MO 64180-1618

Environmental Safety Products
700 W. 6th St.
Michigan City, IN 46360-3866

Estes Express Lines, Inc.
P.O. Box 25612
Richmond, VA 23260-5612

Examintetics, Inc
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Overland Park, KS 66212-1836

Executive Personnel Services, Inc.
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Atlanta, GA 30343-0346

Express Personnel Services
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Farwest Corrosion Control Co.
3825 Paris St.
Denver, CO 80239-3332

Farwest Steel Corporation
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Fastenal Company
P.O. Box 1286
Winona, MN 55987-7286

Fasteners, Inc. (Colony Hardware Corp.)
29276 Network Place
Chicago, IL 60673-1292

Ferguson Enterprises, Inc.
FEI #420
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Chicago, IL 60680-2817

Filnor Inc.
227 N. Freedom Ave.
Alliance, OH 44601-1897

Finish Master Inc.
115 W. Washington St., #700S
Indianapolis, IN 46204-3761

Fishers Technology
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Flame Seal Products, Inc.
15200 West Dr.
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Fluid Connector Products
8432 Solution Center
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Foam Kote, Inc.
1102 Minnesota St.
South Houston, TX 77587-4949

Foundation Building Materials
Home Acres Building Supply Co., LLC
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Elkhart, IN 46516-5537

Grimes Industrial, Inc.
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Tomball, TX 77375-6724

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Elmhurst, IL 60126-1403

Hevi-Haul International, LTD
P.O. Box 580
Menomonee Falls, WI 53052-0580

Hoosier Crane Service Co.
2423 Lowell St.
Elkhart, IN 46516-5710

Hudson Building Systems
10412 Rockley Rd.
Houston, TX 77099-3556

Hypertherm, Inc
21 Great Hollow Rd.
Hanover, NH 03755-3124

Idaho Dept. of Labor
4514 Thomas Jefferson st.
Caldwell, ID 83605-5100

Idaho Environmental Services, LLC
d/b/a IES Waterowkrs
P.O. Box 231
Notus, ID 83656-0231

Idaho Freight Connection, LLC
P.O. Box 357
Homedale, ID 83628-0357

Idaho Mobile Equipment
26003 Kingsbury Rd.
Middleton, ID 83644-6099

Idaho Tank & Culvert, Inc
724 Taylor Ave.
Meridian, ID 83642-2486

Idaho Tool
452 Caldwell Blvd.
Nampa, ID 83651-1925

(p)ILLINOIS DEPARTMENT OF REVENUE
BANKRUPTCY DEPARTMENT
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CHICAGO IL 60664-0338

Impact, Inc.
P.O. Box 88068
Seattle, WA 98138-2068

Indiana Dept of Revenue
105 E. Jefferson Blvd., #350
South Bend, IN 46601-1938

Indiana Dept. of Environmental Mgmt.
100 N. Senate Ave.
Indianapolis, IN 46204-2210

Indiana Michigan Power
P.O. Box 24412
Canton, OH 44701-4412

Industrial Climate Engineering (ICE)
P.O. Box 6407
Carol Stream, IL 60197-6407

Industrial Door of Northern Indiana
3839 S. Main St.
South Bend, IN 46614-2521

Industrial Metal Fab, Inc.
2806 W. Sample St.
South Bend, IN 46619-3299

Industrial Products Corporation
119 S. Sherrin Ave., #120
Louisville, KY 40207-3235

Industrial Realty Group
11100 Santa Monica Blvd., #850
Los Angeles, CA 90025-2399

Intermountain Gas Company
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Bismarck, ND 58506-5600

Internal Revenue Service
P. O. Box 7346
Philadelphia, PA 19101-7346

Interstate Industrial Services Mgmt, LLC
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Houston, TX 77093-5006

Intertek Testing Services NA Inc
P.O. Box 405176
Atlanta, GA 30384-5176

Irrevocable Trust of Thomas J. Snow
c/o Nancy Snow Evitt
9204 Hopi Trail
Ooltewah, TN 37363-8678

Isaac B. Centeno
10706 Cora St., #78
Houston, TX 77088-3240

Ivy Tech Community College
220 Dean Johnson Blvd.
South Bend, IN 46601-3415

J & G Supply Inc.
P.O. Box 902
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J M Test Systems, Inc.
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Baton Rouge, LA 70895-4489

JDM Steel Service, Inc.
8581 Solution Center
Chicago, IL 60677-8005

JSW Properties, LLC
120 Nowlin Ln.
Chattanooga, TN 37421-3574

Johnson Supply
10151 Stella Link
Houston, TX 77025-5398

K-wood Products Co.
25785 State Rd. 2
South Bend, IN 46619-4796

KC Auto Paint and Supplies, Inc.
811 2nd St. South
Nampa, ID 83651-3810

KMH Systems, Inc.
P.O. Box 575
Northbrook, IL 60065-0575

Kasten Blasting & Coatings, LLC
8065 Cox's Dr.
Portage, MI 49002-5827

Kele Solutions
P.O. Box 842545
Dallas, TX 75284-2545

Kim Hotstart Mfg. Co.
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Spokane, WA 99211-1245

Kingman Storage, LLC
2740 W. Lexington Ave.
Elkhart, IN 46514-1447

Kirby-Risk Electric Supply
27561 Network Pl.
Chicago, IL 60673-1275

Kloeckner Metals Corporation
500 Colonial Center Pkwy., #500
Roswell, GA 30076-8853

Koontz-Wagner Construction Services, LLC
3801 Voorde Dr., Suite B
South Bend, IN 46628-1643

Krueger Sentry Gauge
1873 Siesta Ln.
Green Bay, WI 54313-8021

Labor of Love Cleaning Service
809 Claire St.
Rossville, GA 30741-5674

Land O' Lakes
P.O. Box 840897
Dallas, TX 75284-0897

Landstar Inway, Inc.
12793 Collections Center Dr.
Chicago, IL 60693-0127

Lennon Crane and Equipment Co.
17131 Beaton Rd. SE
Monroe, WA 98272-2745

Leonard Petroleum Equipment
P.O. Box 170219
Boise, ID 83717-0219

Letters Express Inc.
d/b/a Worldwide Express
29228 Network Pl
Chicago, IL 60673-1292

Lightning Master Corporation
P.O. Box 6017
Clearwater, FL 33758-6017

Lord Construction Services, LLC
P.O. Box 363408
San Juan, PR 00936-3408

MC Supply & Service Inc.
3907 Marvihill
Valparaiso, IN 46383-6950

MSC Industrial Supply Co., Inc
Dept. CH 0075
Palatine, IL 60055-5075

MTI
30836 CR 8
Elkhart, IN 46514-7947

Madison
27 Business Park Dr.
Branford, CT 06405-2954

Mainfreight, Inc.
1400 Glenn Curtiss St.
Carson, CA 90746-4030

Marathon Special Products
P.O. Box 468
Bowling Green, OH 43402-0468

Maria Mittiga
26142 Twin Lakes Trail
South Bend, IN 46628-9537

Martell Electric, LLC
P.O. Box 3965
South Bend, IN 46619-0965

Marvair, A Division of Airxcel, Inc.
P.O. Box 6407
Carol Stream, IL 60197-6407

Material Control, Inc.
P.O. Box 168
Croswell, MI 48422-0168

Maxim Crane Works, LP
Lockbox #774389
4389 Solutions Center
Chicago, IL 60677-4003

McCall Industrial
P.O. Box 15427
Boise, ID 83715-5427

McMaster-Carr Supply Company
P.O. Box 7690
Chicago, IL 60680-7690

Meitec, Inc. 2800 Veterans Blvd., #260 Metairie, LA 70002	Mersen P.O. Box 7247-6444 Philadelphia, PA 19170-6444	Metalworking Machine Systems, Inc. 500 N. Nappanee St., Suite 5A Elkhart, IN 46514-1502
Metamation, Inc 1465 Terminal Way, #2 Reno, NV 89502-3200	Metro Fabricating, LLC. 1650 Tech Dr. Bay City, MI 48706-9792	Michigan Department of Treasury Lansing, MI 48922-0001
Michigan Dept of Licensing and Regulatory Affairs P.O. Box 30004 Lansing, MI 48909-7504	Microclean, Inc 1720 Industrial Rd. Nampa, ID 83687-6713	Mid-States Bolt & Screw Co., Inc. P.O. Box 2050 Flint, MI 48501-2050
Midwest Fire Protection Co. Inc. 26436 W. US 12 P.O. Box 279 Sturgis, MI 49091-0279	Miller Hydraulic Service 2810 S. Main St. P.O.Box 2732 South Bend, IN 46680-2732	Morrison Bros Inc P.O. Box 238 Dubuque, IA 52004-0238
Mountain High Shredding Inc. 13790 Creston St. Mishawaka, IN 46544-9768	Mountain View Engineering, Inc 345 N. Main St., Suite A Brigham City, UT 84302-2664	N.W. Crane Service, Inc. P.O. Box 88 Hermiston, OR 97838-0088
NAPA 2221 Cleveland Caldwell, ID 83605-4467	NATCON (National Consolidated Corp) 25855 State Rd. 2 South Bend, IN 46619-4736	NMHG Financial Services 10 Riverview Dr. Danbury, CT 06810-6268
Nelson Fuel, Inc. 1511 S. Olive St. South Bend, IN 46619-4297	New Mexico Taxation & Revenue Dept. P.O. Box 8485 Albuquerque, NM 87198-8485	New York State Dept of Taxation and Finance Attn: Office of Counsel, Bldg. 9 W A Harriman Campus Albany, NY 12227-0001
Newark 33190 Collection Center Dr. Chicago, IL 60693-0331	Nitro Environmental LLC 3011 Hwy. 30 W., #101-121 Huntsville, TX 77340-3534	Nolan Power Group, LLC P.O. Box 54986 New Orleans, LA 70154-4986
Norbryhn Equipment Co. 3711 Newby St. Nampa, ID 83687-9224	Norco P.O. Box 413124 Salt Lake City, UT 84141-3124	Norman Perry Trophies & Engraving 244 S. Olive St. South Bend, IN 46619-2100
O'Neal Flat Rolled Metals P.O. Box 951858 Dallas, TX 75395-1858	O'Neal Industries P.O. Box 934243 Atlanta, GA 31193-4243	OJS Building Services, Inc. P.O. Box 418 South Bend, IN 46624-0418

OSHA
690 S Loop 336 West, #400
Conroe, TX 77304-3320

Office Depot, Inc
P.O. Box 633204
Cincinnati, OH 45263-3204

Ohio Dept. of Taxation
30 E. Broad St. 21st Fl.
Columbus, OH 43215-3414

Oil Service, Inc
3498 Grand Ave.
Pittsburgh, PA 15225-1508

OnSite Services, LLC
P.O. Box 190574
Boise, ID 83719-0574

Oregon Dept. of Consumer Business
Revenue Services Station
PO Box 14610
Salem, OR 97309-0445

Orr Safety Equipment
1266 Reliable Pkwy.
Chicago, IL 60686-0012

Oscilloscope Services, Inc.
7827 Kingsley St.
Houston, TX 77087-4637

Overhead Door Co Of South Bend
58745 Executive Drive
P.O. Box 907
Mishawaka, IN 46546-0907

Overhead Door Company of Houston
11533 S. Main St.
Houston, TX 77025-5987

PEI Engineering Services, Inc.
58640 State Rd. 15
Goshen, IN 46528-8670

PPG Architectural Finishes, Inc.
19053 Interstate 45, Suite C
Conroe, TX 77385-8742

Pacific Steel
1900 20th St. North
PO Box 530
Nampa, ID 83653-0530

Panache Engineering
150 N. Santa Anita Ave., #300
Arcadia, CA 91006-3116

Pearman Contracting, LLC.
P.O. Box 14
Greenleaf, ID 83626-0014

Pennsylvania Dept. of Revenue
P.O. Box 280905
Harrisburg, PA 17128-0905

Per Mar Security Services
P.O. Box 1101
Davenport, IA 52805-1101

Performance Plus
The Performance Companies, Inc.
PO Box 10846
Merrillville, IN 46411-0846

Petrol Services
219 W. 40th St.
Garden City, ID 83714-6409

Phoenix Fastener and Supply Inc
15219 Stuebner Airline Rd., #33
Houston, TX 77069-2119

Phoenix Metal
P.O. Box 932589
Atlanta, GA 31193-2589

Phoenix Tires
P.O. Box 983
Friendswood, TX 77549-0983

Platt
P.O. Box 418759
Boston, MA 02241-8759

Praxair Distribution Inc
Dept. 0812
PO Box 120812
Dallas, TX 75312-0812

Praxair Distribution, Inc.
Dept CH 10660
Palatine, IL 60055-0660

Preferred Shipping Inc
12835 Jess Pirtle Blvd.
Sugar Land, TX 77478-2860

Primary Engineering, Inc.
P.O. Box 3664
Carmel, IN 46082-3664

Primary Health
10482 W. Carlton Bay Dr.
Garden City, ID 83714-5143

Primax Technologies, Inc.
65 Hymus Blvd.
Pointe-Claire, Quebec

Pro Industries, Inc
206 Varner Dr. SW
Mc Donald, TN 37353-5633

Professional Welding Supply
P.O. Box 19811
Houston, TX 77224-9811

Proservcrane & Equipment, Inc.
P.O. Box 670965
Houston, TX 77267-0965

Proshred of Houston
12703 Capricorn Dr., #100
Stafford, TX 77477-4025

Punch Press and Shear
8 Ellis Rd.
League City, TX 77573-1720

R.W. Little & Associates
P.O. Box 171
Brimfield, IL 61517-0171

RC Industries, Inc.
555 County Rd. 15
Elkhart, IN 46516-9784

RMS Energy Co., LLC
1900 E. 66th Ave.
Denver, CO 80229-7424

RST Inc
P.O. Box 357
Homedale, ID 83628-0357

Rackmount Solutions, LTD
P.O. Box 451537
Garland, TX 75045-1537

Rain Mizer Gutters
5606 Rocky Trail Dr.
Kingwood, TX 77339-3384

Rapid Electroplating Process
1603 S. Michigan Ave.
Chicago, IL 60616-1209

Recycling & Waste Reduction
8001 Boat Club Rd., Suite B
Fort Worth, TX 76179-3636

Red-D-Arc Welderentals
P.O. Box 532618
Atlanta, GA 30353-2618

Ricoh Usa, Inc
13430 Northwest Frwy., #500
Houston, TX 77040-6020

River Bend Hose Specialty
1111 S. Main
South Bend, IN 46601-3398

Root Rents
2602 Cleveland Blvd.
Caldwell, ID 83605-4439

Royal Cup Coffee
P.O. Box 170971
Birmingham, AL 35217-0971

Russell Products Inc.
710 Commerce Dr.
Bristol, IN 46507-9354

SAIA Motor Freight Line, LLC
11465 Johns Creek Pkwy., #400
Johns Creek, GA 30097-1572

Safety Wear LTD
P.O. Box 2904
Orange, TX 77631-2904

Safety-Kleen
P.O. Box 382066
Pittsburgh, PA 15250-8066

Safety-Kleen
P.O. Box 650509
Dallas, TX 75265-0509

Samuel, Son & Co. Inc. MW Division
5022 Ashley Ct.
Houston, TX 77041-6911

Sherwin Williams
3210 Nimitz Pkwy.
South Bend, IN 46628-4316

Sherwin Williams (south)
1315 E. 23rd St.
Chattanooga, TN 37404-5751

Shred-it USA - Knoxville
P.O. Box 13574
Newark, NJ 07188-3500

Siemens Financial Services
170 Wood Ave. South
Iselin, NJ 08830-2726

Siemens Financial Services
301 Lindenwood Ave., #215
Malvern, PA 19355-1774

Siemens Industry, Inc.
P.O. Box 2715
Carol Stream, IL 60132-2715

SmartSign
300 Cadman Plaza W., #1303
Brooklyn, NY 11201-3226

Snow Evitt Partnership
c/o Nancy Snow Evitt
9204 Hopi Trail
Ooltewah, TN 37363-8678

South Bend Tribune
225 W. Colfax Ave.
South Bend, IN 46626-1001

(c)SOUTHERN AUTO BODY SUPPLY
1830 WASHINGTON ST
CHATTANOOGA TN 37408-2018

St. Joseph Paper & Packaging
P.O. Box 3908
South Bend, IN 46619-0908

Stanz Food Service, Inc.
P.O. Box 24
South Bend, IN 46624-0024

Staples
P.O. Box 105638
Atlanta, GA 30348-5638

State of Idaho
Department of Water Resources
2735 Airport Way
Boise, ID 83705-5082

Steinhoffer Scale Co., Inc
55645 Currant Rd.
Mishawaka, IN 46545-4801

Sterling Battery Co
P.O. Box 4947
Boise, ID 83711-4947

Storage Battery Systems, LLC
N56 W16665 Ridgewood Dr.
Menomonee Falls, WI 53051-5672

Strata
8653 W. Hackamore Dr.
Boise, ID 83709-1667

Structural Edge Engineering
5509 N. Glenwood St.
Garden City, ID 83714-1336

Summit Contractor Supply, Inc.
25453 State Rd. 2
South Bend, IN 46619-4806

Sunscapes, Inc.
13740 Range Line Rd.
Niles, MI 49120-9020

Superior Paint & Glass
315 Cleveland Blvd.
Caldwell, ID 83605-3697

Suprahelio Consulting LLC/Aaron Alexande
13303 E. Lakeview Rd.
Glencoe, OK 74032-3203

TBS Trucking - T Boys and Sons Trucking,
P.O. Box 2851
Houston, TX 77252-2851

TDS Door Company
27992 West IL Hwy. 120, Unit 132
Lakemoor, IL 60051-7263

THB, Inc
95 North 400 West
North Salt Lake, UT 84054-2722

TQS, Inc
14610 Sheraton
Houston, TX 77039-1226

TTI Oil - Texas INE, Inc
6438 Long Dr.
Houston, TX 77087-3408

TUV Rheinland Industrial Solutions Inc.
P.O. Box 417532
Boston, MA 02241-7532

TW Telecom
c/o Level 3 communications, LLC
P.O. Box 910182
Denver, CO 80291-0182

TX Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Tacoma Screw Products, Inc.
P.O. Box 35165
Seattle, WA 98124-5165

Taylor Brothers Fire & Safety, Inc
P.O. Box 16351
Boise, ID 83715-6351

Team Consulting, Inc
516 E. Marion St.
Mishawaka, IN 46545-6508

Tennessee American Water
P.O. Box 371880
Pittsburgh, PA 15250-7880

Tennessee Dept. of Revenue
David Gerregano
500 Deaderick St.
Nashville, TN 37242-0001

Tennessee Galvanizing, Inc
P.O. Box 4539
Chattanooga, TN 37405-0539

Terracon Consultants, Inc
P.O. Box 843358
Kansas City, MO 64184-3358

(p) TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION
PO BOX 13528
AUSTIN TX 78711-3528

Texas Department of Licensing and Regula
P.O. Box 12157
Austin, TX 78711-2157

Texas Workforce Commission
17517 State Hwy. 249
Houston, TX 77064-1012

The Dillon Group Inc.
1117 E. Plaza Dr.
Eagle, ID 83616-6531

The Exit Store
303 W. Lancaster Ave., #138
Wayne, PA 19087-3938

The Filter Factory, Inc.
P.O. Box 1797
Santa Ynez, CA 93460-1797

The Sign Center
11473 W. Fairview Ave.
Boise, ID 83713-7940

The Sign Shoppe
3610 E. Cleveland
Caldwell, ID 83605-6040

Titus Manugacturing
9887 E. 6B Rd.
Plymouth, IN 46563-8913

Tour Ice of Ontario
359 SE 2nd St.
Ontario, OR 97914-2825

Trainers Over Texas, Inc.
2914 Dunnbrook Dr.
Seagoville, TX 75159-1448

Trans United, Inc.
Marquette Transportation Finance, Inc.
NW 7939
PO Box 1450
Minneapolis, MN 55485-7939

Treasure Valley Coffee
11875 President Dr.
Boise, ID 83713-8976

Tri-State Electrical Contractors, LLC
2101 Fort St.
Chattanooga, TN 37408-2414

Trinity Logistics, Inc
P.O. Box 62702
Baltimore, MD 21264-2702

Turnstone EH&S, Inc.
1322 Space Park Dr., Suite C-139
Houston, TX 77058-3542

Twelco, Inc
7411 Wright Rd.
Houston, TX 77041-2421

US Environmental Protection Agency
1200 Pennsylvania Ave.
Washington, DC 20460-0003

US HealthWorks Medical Group of Indiana
P.O. Box 404480
Atlanta, GA 30384-4480

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

USI Inc.
P.O. Box 4105
Woburn, MA 01888-4105

Uline
2200 S. Lakeside Dr.
Waukegan, IL 60085-8311

Underwriters Laboratories Inc.
P.O. Box 75330
Chicago, IL 60675-5330

UniFirst Corporation
3920 Crescent Cir.
South Bend, IN 46628-6137

Unishippers
P.O. Box 1120
Meridian, ID 83680-1120

United Coatings Technologies
1011 S. Main St.
South Bend, IN 46601-3335

United Oil
P.O. Box 160
Caldwell, ID 83606-0160

United Rentals
P.O. Box 100711
Atlanta, GA 30384-0711

United Rentals Northwest, Inc
File 51122
Los Angeles, CA 90074-0001

VFP Fire Systems
P.O. Box 74008409
Chicago, IL 60674-8409

Vanguard Fire & Security Systems, Inc.
P.O. Box 9218
Wyoming, MI 49509-0218

Velocity Business Products, Inc.
335 Pennbriht Dr., #130
Houston, TX 77090-5909

Victor Insulators, Inc.
280 Maple Ave.
Victor, NY 14564-1385

W.W. Grainger, Inc.
Dept. 810568832
Palatine, IL 60038-0001

WCS Quality Registrars, LLC
P.O. Box 940637
Houston, TX 77094-7637

WESCO Distribution. Inc.
7049 Brookhollow West Dr.
Houston, TX 77040-3241

Washington State Dept. of Revenue
P.O. Box 47464
Olympia, WA 98504-7464

Weld Force Solutions, LLC
12518 Foxton Rd.
Houston, TX 77048-3811

Wells Fargo
90 S. 7th St., 16th Fl.
Minneapolis, MN 55479-0001

Wells Fargo Credit Card
420 Montgomery St.
San Francisco, CA 94104-1298

Western Specialties Inc
5265 N. Sawyers Ave.
Boise, ID 83714-1496

Westowns Disposal Inc
P.O. Box 754
Homedale, ID 83628-0754

Wiley Road Industrial Park, L.P.
3801 Voorde Dr.
South Bend, IN 46628-1643

Williams Industrial Services Group Inc
400 E. Las Colinas, #400
Irving, TX 75039-5534

Williams Industrial Services Group LLC
100 Crescent Centre Pkwy., #1240
Tucker, GA 30084-7063

Workforce Corp Health
P.O. Box 189
Chattanooga, TN 37401-0189

Working Persons Store
1608 Commerce Dr.
South Bend, IN 46628-1503

Yale Carolinas
9839 South Tryon
Charlotte, NC 28273-6505

ZFA Structural Engineers
1212 Fourth St., Suite Z
Santa Rosa, CA 95404-4039

Mark Edward Andrews
Dykema Cox Smith
1717 Main Street, Suite 4200
Dallas, TX 75201-4876

Rodney D Tow
Rodney Tow, PLLC
1122 Highborne Cay Court
Texas City, TX 77590-1403

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Airgas USA, LLC
P.O. Box 676015
Dallas, TX 75267

GreatAmerica Financial Services Corp.
P.O. Box 660831
Dallas, TX 75266-0831

Illinois Dept. of Revenue
James R. Thompson Center - Concourse
100 West Randolph St.
Chicago, IL 60601-3274

Texas Comptroller of Public Accounts
P.O. Box 13528, Capitol Station
Austin, TX 78711-3528

Addresses marked (c) above for the following entity/entities were corrected
as required by the USPS Locatable Address Conversion System (LACS).

Southern Auto Body Supply
1823 Rossville Ave.
Chattanooga, TN 37408

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Delta Management
52733 Willow Bend Dr.
OH 45530-7472

(d)Fastenal Company, Inc.
P.O. Box 1286
Winona, MN 55987-7286

(d)GP South, LLC
129 N. 10th St.
Capitol Hall
Lincoln, NE 68508-3633

(u)Idaho State Tax Commission
P.O. Box 36
81722-0410

(d)Michigan Dept. of Treasury
Lansing, MI 48922-0001

(d)The Dillon Group, Inc.
1117 E. Plaza Dr.
Eagle, ID 83616-6531

End of Label Matrix
Mailable recipients 381
Bypassed recipients 6
Total 387